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BY ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Oral Ex Parte Presentation
Docket No. 94-102**

Dear Ms. Dortch:

On behalf of my client QUALCOMM Incorporated ("QUALCOMM"), this is to report that Jonas Neihardt of QUALCOMM and I met today with John Muleta, Joel Taubenblatt, Jennifer Tomchin, and Dan Grosh of the Wireless Bureau (the "Wireless Bureau Staff") to discuss three matters relating to the above-referenced docket.

First, we provided the Wireless Bureau Staff with an update of the progress made by QUALCOMM in manufacturing chips containing Assisted-GPS position location technology which have been incorporated into millions of wireless phones in compliance with the Commission's E911 mandate. We explained that there are now well over 10 million wireless phones in the United States containing Assisted-GPS E911 technology, and that we expect to see a continued proliferation of these phones.

Second, we discussed with the Wireless Bureau Staff the waivers of the Commission's E911 accuracy rules that a number of rural carriers operating wireless systems using analog or TDMA technology have requested from the Commission. We pointed out that such carriers cannot show the lack of a reasonable alternative to a waiver, because such carriers can convert to the CDMA air interface and implement Assisted-GPS as their E911 solution, thereby complying with Commission's accuracy rules in light of the highly accurate and precise performance of Assisted-GPS. We noted a recent filing by one rural carrier which serves one RSA which has opted for this path to comply with the Commission's E911 rules, and stated that there is no reason why the other rural carriers seeking waivers of the accuracy rules could not adopt the same approach.

Third, we emphasized the importance of the Commission enforcing its rules and the terms of prior waiver Orders and Consent Decrees with respect to carriers who have chosen to implement a network solution over the GSM air interface. We explained that to the extent that such carriers encounter technical issues in implementing a network solution which will substantially delay them from initiating Phase II service, these carriers, too, have reasonable alternatives. We told the Wireless Bureau Staff that in July, QUALCOMM will begin sampling its MSM6250 chipset, which incorporates Assisted-GPS for both the GSM and WCDMA/UMTS air interfaces, and we expect that commercial handsets containing the MSM6250 should be available by the second half of next year. Moreover, we also stated that we believe commercial handsets containing Assisted-GPS for the GSM air interface not using a QUALCOMM chip may be available in Europe before the end of this year. As a result, we asked that rather than permitting any further delay from the GSM carriers in implementing Phase II service due to technical issues with a network solution, the Commission should require the carriers immediately to adopt and begin implementing a compliant solution, and that Assisted-GPS is such a compliant solution.

I am filing this letter with the Commission electronically via the ECFS system.

Respectfully submitted,

/s/ Dean R. Brenner

Dean R. Brenner
Attorney for QUALCOMM Incorporated

cc: John Muleta (via email)
Joel Taubenblatt (via email)
Jennifer Tomchin (via email)
Dan Grosh (via email)